

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA, MIAMI DIVISION
Case No. 1:23-md-03076-KMM**

IN RE:

FTX Cryptocurrency Exchange Collapse Litigation

This Document Relates To:

Chernyavsky, et al. v. Temasek Holdings (Private) Limited, et al.
Case No. 1:23-cv-22960 (S.D. Fla.)

Cabo, et al. v. Temasek Holdings (Private) Limited, et al.
No. 1:23-cv-23212 (S.D. Fla.)

**DECLARATION OF MATTHEW GRAHAM IN SUPPORT OF
DEFENDANT SINO GLOBAL CAPITAL HOLDINGS, LLC'S
MOTION TO DISMISS**

I, MATTHEW GRAHAM, being over the age of 21, hereby declare as follows:

1. I am the managing member of Defendant Sino Global Capital Holdings, LLC ("SG Capital Holdings"). I have personal knowledge of all of the following facts and, if called as a witness, could and would competently testify thereto.
2. On August 11, 2023, SG Capital Holdings, via its registered agent CSC, received a notice regarding tag-along actions.
3. On August 14 and 16, 2023, SG Capital Holdings, via CSC, received the Complaint in *Cabo, et al. v. Temasek Holdings (Private) Limited, et al.*, No. 3:23-cv-03974 (N.D. Cal.).
4. On August 16, 2023, SG Capital Holdings, via CSC, received the Complaint in *Chernyavsky, et al. v. Temasek Holdings (Private) Limited, et al.*, Case No. 1:23-cv-22960 (S.D. Fla.).

5. On August 16, 2023, SG Capital Holdings, via CSC, received a Notice of Filing of Conditional Transfer Order.

6. To date, SG Capital Holdings has not been served with the Corrected Administrative Class Action Complaint and Demand for Jury Trial in *In re: FTX Cryptocurrency Exchange Collapse Litigation*, Case No. 1:23-md-03076-KMM, ECF No. 182, the operative pleading against SG Capital Holdings.

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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on September 22, 2023.


DocuSigned by:
Matthew Graham
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Matthew Graham